

REMARKS

Claims 1-8, 19-27 and 37-39 are rejected under 35 USC §103(a) as being unpatentable over Terry (2001/0012346 A1). Claims 9-19 were rejected under 35 USC §103(a) as being unpatentable over Terry in view of Aleia, US patent 5,991,733. Reconsideration and withdrawal of these rejections are respectfully requested.

At the outset, the Examiner will note that the independent claims have been amended so as to include the subject matter of claim 9, drawn to the customer creating and submitting a Credit Memo Request to dispute an invoice. Corresponding changes have been made to the dependent claims. New media claims are presented herewith.

The Office Action of October 8, 2003 acknowledges that Terry fails to disclose to dispute a bill and to create a Credit Memo Request. It falls, therefore, to the secondary reference to Aleia to supply the teachings acknowledged to be missing from the primary reference.

It is respectfully submitted that Aleia does not teach, alone or in combination with Terry, the recited step of:

**enabling the customer to remotely dispute all or a portion of the displayed invoice by providing the customer with a user interface configured to enable the customer to create a credit memo request on the disputed invoice and to submit the created credit memo request to the deploying company.**

In Aleia, the customer does not create a Credit Memo Request, nor does the customer submit the created credit memo request to the deploying company, as required by the pending claims. Instead, Aleia discloses computerized methods for automating decisions regarding the settling or escalation of insurance accounts that are delinquent for failure to pay the insurance premiums. This automated decision support framework either routes the delinquent account to dispute resolution activities or litigation activities. These choices are taken by a recovery

specialist that is guided by an automated decision framework. In Aleia, the customer is never disclosed or suggested to create a Credit Memo Request or submit it to the deploying company. Instead, the collection activities disclosed in Aleia are initiated and carried out by designated recovery specialists, outside collection activities and/or litigation attorneys, as guided by the automated decision support such as e.g., a scripted dispute processing scheme, as detailed below:

Scripting by the system involves creating a series of questions which a collector would be prompted to ask a debtor in reference to a particular issue or DISPUTE. The collector has the ability to input replies or answers to the questions and store them for future access. The scripting process and replies by the collector reside in the word processing facility in the workstation for inclusion in letters, documents, memos, etc. Upon a determination that the complaint does not present a new issue 910, the system determines, using collector or management judgement, whether the case is ready for escalation to a collection agency or litigation 907 or reprocessing from the collector's queue 901. In summary, the workflow process at this stage automates generation of letters to the debtor, scripted DISPUTE handling, and determination whether the case is referable to a collection agency or outside counsel. Col. 17, lines 27-42.

In Aleia, the dispute in question is a collection issue (necessarily initiated by the creditor - and not the debtor), with the recovery specialist initiating and driving the outcome of the dispute. The insured, in Aleia, does not create a Credit Memo Request, nor does he or she submit the created Credit Memo Request to the deploying company, as required by the independent claims.

Therefore, a combination of Terry and Aleia does not teach or suggest the claimed inventions. At most, such a combination might teach an interactive telecommunication (think telephone) billing system (as taught by Terry), whereby delinquent accounts are handled to resolution in an automated and scripted manner, from settlement, referral to an outside credit collection agency or referred for litigation (as taught by Aleia). Such a combination would utterly fail to teach or to suggest any manner of the customer displaying the deploying company's AR information for which they are responsible and being provided with a user interface enabling the customer to dispute all or part of an invoice and to create and submit a Credit Memo Request

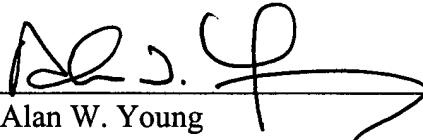
themselves, as recited and required by the pending claims. In view of the foregoing, reconsideration and withdrawal of the 35 USC §103(a) and 102(b) rejections are believed to be warranted and are, therefore, respectfully requested.

Applicants' attorney believes that all claims are allowable as incorporating allowable subject matter and that the present application is now in condition for an early allowance and passage to issue. If any unresolved issues remain, the Examiner is respectfully invited to contact the undersigned attorney of record at the telephone number indicated below, and whatever is required will be done at once.

Respectfully submitted,

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